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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

c/o Crab Orchard National Wildlife Refuge  
8588 Rt. 148 - Marion, IL 62959

REPLY TO THE ATTENTION OF:

June 27, 2001

Mike Light  
Project Coordinator  
Solutia Inc.  
575 Maryville Centre Drive  
St. Louis, Missouri 63141

Re: Sauget Sites Area 1 - May 31, 2000 Unilateral Administrative Order  
Groundwater Monitoring Plan

Dear Mr. Light,

On March 20, 2001 the U.S. EPA received a copy of a Groundwater Monitoring Plan in conjunction with the Dead Creek Sediments and Soil TSCA Containment Cell as required by the Unilateral Administrative Order (UAO), Work to be Performed. After review of this document, the U.S. EPA offer the following comments. In addition, attached is a copy of Illinois EPA comments on the same subject as drafted by Terri Myers.

1. Page 20, Section 5, First Paragraph:

Please include a Figure which details where the EE/CA and RI/FS completed groundwater investigation activities around Sites G, H, I, and L.

2. Page 20, Section 5.1, Table at bottom of page:

Please include a Figure which shows where the Southwest Transect near Site G is located in relation to the Containment Cell. Include on this figure the locations of the data represented in this table (as well as the table on page 21, Section 5.2) in relation to the Containment Cell.

Which boring within the fill area did these maximum detected total VOCs (as well as SVOCs) originate?

3. Page 23, Section 6:

The groundwater monitoring network needs more monitoring locations. There needs to be additional wells both upgradient and down gradient. The additional upgradient wells should be

east of Dead Creek, in the open field near Falling Springs Road. The additional down gradient wells needs to be farther west of the Containment Cell 150 to 200 yards from the toe. Please change the document to reflect this change.

The monitoring system should include nested wells at several locations (at least four of the six locations). This would include the SHU and the MHU at a minimum. The MHU wells should be screened at the optimal locations to intersect any leakage which might occur in the future. Please change the document to reflect that nested wells at four of the six monitoring locations will be installed.

4. Page 23 and 24, Section 6.3:

How was it determined in the last paragraph of this section that *"the background groundwater quality standard will be recomputed prior to each monitoring event using the 13 most recent rounds of groundwater data"*? Which wells are a part of the monitoring event? Are wells outside of the 10 monitoring wells proposed herein included? Why the 13 most recent rounds?

This approach appears to me to be a moving target. If the groundwater data indicates an increase, then background would also go up?

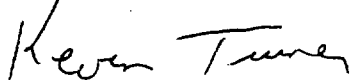
5. Page 25 through 30, Section 6.5:

Your sampling parameters are woefully incomplete. Though the U.S. EPA appreciates the discussions of Illinois's TACO, there is no mention of a Federal ARAR called "MCLs"?

It is common knowledge what has been found in Dead Creek and Site M sediments. Also, it appears as if you discounted the data collected by E&E. There are several instances within Table 3 where a concentration exceeds the TACO Tier 1 Objective, yet the compound does not make it to the detection parameter list. Please expand the detection parameter list to include VOCs, SVOCs, PCBs, and some limited pesticides and herbicides.

Please take both mine and Illinois EPA's comments, incorporate them into a revised document and submit it for further review. In the interest of time please submit the revise document by July 27, 2001. If needed, we can schedule a face-to-face meeting before July 27<sup>th</sup> to clarify any questions. It is the U.S. EPA's expectation that Solutia will have completed your internal procurement process before the Groundwater Monitoring Plan is approved. The completed procurement process is needed in order to install the required monitoring wells and have them sampled before any waste is placed into the containment cell. If there are any questions, please call me at (618) 997-0115 at your earliest opportunity.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Turner".

Kevin Turner  
U.S. EPA

cc: Mike McAteer - U.S. EPA  
Tom Martin - U.S. EPA ORC  
Teri Myers - IEPA